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Attorneys for Defendants
WELLS FARGO & COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A., WACHOVIA
SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JORGE V. RAGDE, JR. AND JENNIFER J.
RAGDE, On Behalf of Themselves and All
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, WACHOVIA
MORTGAGE CORPORATION, WACHOVIA
BANK, N.A., WACHOVIA SECURITIES, LLC,
WACHOVIA SECURITIES FINANCIAL
NETWORK, LLC, WACHOVIA
CORPORATION, and DOES 1-10 Inclusive,

Defendants.

Case No. C 09-0226-SI

**STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT AND
CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE
AND RELATED DEADLINES**

WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;

WHEREAS, on March 30, 2009, the parties submitted a second stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to May 4, 2009;

WHEREAS, the Initial Case Management Conference in this matter is currently scheduled for Friday, May 29, 2009 at 2:30 p.m.;

1 WHEREAS, the Parties' Rule 26(f) Report and Joint Case Management Statement are
2 currently due May 22, 2009, 7 days prior to the Initial Case Management Conference;

3 WHEREAS, the Parties are currently required to file ADR Certifications and a Stipulation
4 to ADR Process or Notice of Need for ADR Phone Conference by May 8, 2009, 21 days prior to
5 the Initial Case Management Conference;

6 WHEREAS, the Parties, through their counsel, have engaged in an informal exchange of
7 information and continue to engage in productive settlement discussions in the hope of resolving
8 the issues presented in Plaintiffs' complaint without further litigation;

9 WHEREAS, the parties wish to continue that process without incurring unnecessary
10 expense;

11 IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and
12 Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer
13 J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia
14 Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia
15 Corporation, through their respective attorneys, that the time by which defendants may plead or
16 otherwise respond to the Complaint shall be extended to and include **Monday, June 8, 2009**.

17 IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local
18 Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled
19 for **Friday, May 29, 2009**, shall be continued to **Friday, July 10, 2009** or any date thereafter at
20 the Court's convenience. Additionally, in accordance with FRCP 26(f) and Local Rule 16-9(a),
21 the Parties Rule 26(f) Report and Joint Case Management Conference Statement will be due
22 seven (7) days prior to the rescheduled Initial Case Management Conference. The ADR
23 Certifications and a Stipulation to ADR Process or Notice of Need for ADR Phone Conference
24 will be due twenty-one (21) days prior to the rescheduled Initial Case Management Conference.

1 Dated: April 30, 2009

JEFFREY F. KELLER
DENISE L. DÍAZ
KELLER GROVER LLP.

2 By /s/ Denise L. Díaz
3 Denise L. Díaz

4 Attorneys for Individual and Representative
5 Plaintiff JORGE V. RAGDE, JR. and JENNIFER
6 J. RAGDE

7 Dated: April 30, 2009

JAMES R. McGUIRE
NATALIE NAUGLE
MORRISON & FOERSTER LLP

8 By /s/ James R. McGuire
9 James R. McGuire

10 Attorneys for Defendant WELLS FARGO &
11 COMPANY, WACHOVIA MORTGAGE
12 CORPORATION, WACHOVIA BANK, N.A.,
13 WACHOVIA SECURITIES, LLC, WACHOVIA
14 SECURITIES FINANCIAL NETWORK, LLC,
15 WACHOVIA CORPORATION

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated:

18 By: 
19 Judge Susan Illston

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from Denise L. Diaz and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

Date: April 30, 2009

By /s/ James R. McGuire

James R. McGuire

Attorneys for Defendant WELLS FARGO &
COMPANY, WACHOVIA MORTGAGE
CORPORATION, WACHOVIA BANK, N.A.,
WACHOVIA SECURITIES, LLC, WACHOVIA
SECURITIES FINANCIAL NETWORK, LLC,
WACHOVIA CORPORATION